

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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September 30, 2022

**Via Electronic Filing**

The Honorable Judge John G. Koeltl  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Rene v. 31 East 21 Express Inc.*  
Case No.: 1:21-cv-07435-JGK

Dear Honorable Judge Koeltl:

This law firm has been recently been retained by Defendant Thanaphan Laonutwuttikul (the “Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules I(A) and I(E), this letter respectfully serves to request an *Nunc pro tunc* extension of Defendant’s time to reply or otherwise respond to Plaintiff’s Complaint to be extended from September 7, 2022, to, through and including October 27, 2022.

This is the first request of its nature, and is made on consent of Plaintiff’s counsel. If granted, this request would not affect any other scheduled deadlines.

The basis of the request is that the Defendant has only recently engaged the undersigned counsel has recently been engaged [see Dckt. Nos. 64 and 65]. A short extension of time is needed to gather information from Defendant, before responding to the Complaint.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel